

June 22, 2018

Via Hand Delivery
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission

445 12th Street, SW Washington, DC 20554

Re: Promoting Telehealth and Telemedicine in Rural America, WC Docket No. 17-310

Dear Ms. Dortch,

TeleQuality Communications, LLC ("TeleQuality") hereby submits for the Commission's approval additional interstate rural rates for purposes of providing service to healthcare providers ("HCPs") through the Rural Health Care Telecommunications Program.

TeleQuality is currently working with HCPs seeking telecommunications services for 2018 through the Telecommunications Program. To establish its rural rates for 2018, TeleQuality has followed the requirements of 47 C.F.R. § 54.607 and the recent USAC guidance. TeleQuality does not provide service to commercial customers other than HCPs, so it cannot calculate rural rates based on the average rate charged to commercial customers for similar services pursuant to 47 C.F.R. § 54.706(a) (USAC's Method 1). In some cases, TeleQuality may be able to establish a rural rate by calculating the average of tariffed or other publicly available rates for similar services in the same rural area pursuant to 47 C.F.R. § 54.706(b) (USAC's Method 2). In cases where due diligence has not revealed any tariffed or other publicly available rates for "the same or similar services in that rural area over the same distance as the eligible service," or where TeleQuality has reasonably determined that Method 2 results in a rate that is "unfair," TeleQuality must submit its rates for interstate services to the Commission for approval pursuant to 47 C.F.R. § 54.607(b) (USAC Method 3).

Attached please find TeleQuality's interstate rates for the Telecommunications Program for Funding Year 2018 (shown in Attachment 1 as the TeleQuality 2018 Interstate Rate Sheet) for areas served using USAC Method 3. Also attached, as required by 47 C.F.R. § 54.706(b)(1), is the justification for TeleQuality's rural rates including cost itemizations (shown in Attachment 2 as the TeleQuality 2018 Interstate Rate Cost Justification).

These rates are all for services that are interstate interexchange and/or CLEC business data services, and which were subject to competitive bidding. As such, these are all services that

¹ USAC, *Telecom Program: Urban and Rural Rates*, https://www.usac.org/_res/documents/rhc/pdf/handouts/TelecomRuralUrbanRateInfo.pdf.

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the Commission has mandatorily or permissively detariffed because of the presence of a competitive market. See 47 C.F.R. § 61.19; Hyperion Telecommunicatons Inc. Petition Requesting Forbearance, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 12 FCC Rcd 8596 (1997) ("[W]e have previously determined that [CLECs] are nondominant, and that nondominant carriers, 'by definition,' cannot exercise market power.") See also 47 C.F.R. § 61.201 (detariffing ILEC business data services). Moreover, even if a tariff were filed (which is no longer permitted for interexchange services, including interexchange private lines), these are rates charged by a nondominant carrier and thus would be considered prima facie lawful and permitted to take effect on one day's notice. See 47 C.F.R. § 1.773(a)(ii). As such, although the margins for individual contract prices vary, as would be expected under competitive bidding in which bids are submitted in advance based on estimated costs, that variance does not create a basis for determining these rates to be unreasonable or not cost-based. Indeed, forcibly setting a different rate distorts the market and harms consumers. See Nat'l Ass'n of Telecommunications Officers & Advisors v. Fed. Commc'ns Comm'n, 862 F.3d 18, 25 (D.C. Cir. 2017) ("Rate regulation of a firm in a competitive market harms consumers.")

The TeleQuality 2018 Interstate Rate Cost Justification (Attachment 2) contains forward-looking estimates of TeleQuality's costs during the 2018 Funding Year, and thus contains business-sensitive confidential information. Pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457, 0.459, TeleQuality hereby requests confidential treatment of Attachment 2, which should be withheld from public inspection.

In support of this request, TeleQuality hereby states as follows:

1. Identification of Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

TeleQuality seeks confidential treatment with respect to the TeleQuality 2018 Interstate Rate Cost Justification (the "Confidential Information"). TeleQuality does not seek confidential treatment with respect to the information contained in the TeleQuality 2018 Interstate Rate Sheet.

2. Description of Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

TeleQuality is disclosing the Confidential Information pursuant to 47 C.F.R. § 54.607(b)(1). TeleQuality needs to establish some of its rural rates under the Telecommunications Program by submitting those rates to the Commission. As required by the rules, the submission must include "a justification of the proposed rural rate, including an itemization of the costs of providing the requested service." *Id*.

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3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The information in the TeleQuality 2018 Interstate Rate Cost Justification is commercial or financial and contains trade secret information. The justifications for TeleQuality's rates include detailed information regarding the prices TeleQuality pays to its wholesale providers as well as TeleQuality's own costs to serve HCPs. In addition, the Cost Justification includes information about how TeleQuality provisions services to HCPs to meet their unique business needs; this information describes TeleQuality's internal business practices and techniques and is sensitive commercial information.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The market for the services at issue is subject to competition; the level of competition varies based on the element of the service and the specific location.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

First, disclosure of the information in the response would provide TeleQuality's competitors with sensitive insights related to TeleQuality's services and how it provisions its services to meet its customers' unique needs. Disclosure of this information would allow TeleQuality's competitors to use this information to determine TeleQuality's competitive position and associated revenues and thereby gain a competitive advantage. Second, disclosure of TeleQuality's Confidential Information would place TeleQuality at a competitive disadvantage, as TeleQuality lacks the same information regarding its competitors. Third, disclosure of the information could damage TeleQuality's relationships with its wholesale providers, to the extent that it has purchased wholesale inputs at rates that are not generally publicly available. Finally, disclosure of this information could harm the competitive bidding process in the RHC program.

6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))

The Cost Justification has been kept private and internal to TeleQuality and its parent company. Each page of Attachment 2 is clearly marked "TeleQuality Proprietary – Not for Public Disclosure."

7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))

TeleQuality has not previously disclosed to third parties, other than its counsel, its parent company, and relevant state commissions any of the information in the Cost Justification.

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8. Justification of Period During Which the Submitting Party Asserts that Material Should Not Be Available for Public Disclosure (Section 0.459(b)(8))

TeleQuality requests that the Cost Justification not be disclosed for 10 years from the date of this request. By that time, the sensitivity of TeleQuality's commercial information will have diminished, as market changes will render it increasingly dated, and would make it difficult for competitors to gauge TeleQuality's current market position and revenues.

* * * *

Should you have further questions or require additional information in order to grant the requested confidentiality treatment, please contact me immediately so that I can provide further assistance to resolve this matter.

Sincerely,

John T. Nakahata

Counsel to TeleQuality Communications, LLC

Attachs.

Circuit Information		
Circuit Address	402 South Lee Street, Hampton, AR 71744	
Billing Account Number	CAB.AR.0014	
G I	4 . 1. 511 .	
Speed	1 gb Ethe	rnet
Rate	\$	8,406.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	402 South Lee Street, Hampton, AR 71744	
Billing Account Number	CAB.AR.0015	
Chand	100 mb Ethernet	
Speed	100 mb Ethernet	
Rate	\$	8,375.00
Cost Itemization -		
Circuit Costs	ć	
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
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Percentage Margin		

Circuit Information		
Circuit Address 210 North Main, Amity, AR 719		
Billing Account Number	CAB.AR.0016	
Speed	10 mb ethernet	
Rate	\$ 4,225.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 150 North School Street, Bearden, AR 71		
Billing Account Number	CAB.AR.0017	
Speed	10 mb ethernet	
Rate	\$	4,225.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 205 Smith Road, Hope, AR 718		
Billing Account Number	CAB.AR.0018	
Speed	10 mb ethernet	
Rate	\$ 4,225.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
ircuit Address 1117 Chestnut Street, Lewisville, AR 71		
Billing Account Number	CAB.AR.0019	
Speed	10 mb ethernet	
Rate	\$ 4,225.	.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 253 South Concord, Strong, AR		
Billing Account Number	CAB.AR.0021	
	40	1
Speed	10 mb ethe	ernet
Rate	\$	4,142.56
- Indice	Υ	1,11100
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
operating and service delivery costs		
Working capital		
<u> </u>		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Margin		
Percentage Margin		
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Circuit Information			
Circuit Address 60 May Lane, Burton, N			, WV 26562
Billing Account Number	CBH.W\	/.0005	
Speed		45 mb	
Rate	\$		16,388.00
Cost Itemization -	_		
Circuit Costs	\$		
Transport and Interconnection costs			-
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address 5861 Mason Dixon Highway, Blacksville, WV 26		
Billing Account Number	CBH.WV.0006	
Speed	45 mb	
Rate	_ \$	
Cost Itemization -	_ _	
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 307 Chisum Street, Sicily Island, LA 7		ily Island, LA 71368
Billing Account Number	CHP.LA.0009	
Speed	DS3 - 4	15 mb
Rate	\$	8,226.00
Cost Itemization -		
Circuit Costs		
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 307 Chisum Street, Sicily Island, LA 71		
Billing Account Number	CHP.LA.0010	
Speed	DS3 - 45 mb	
Rate	\$	8,753.00
Cost Itemization -		
Circuit Costs		
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 710 Chisum Street, Sicily Island, LA		Island, LA 71368
Billing Account Number	CHP.LA.0011	
Speed	N x T-1	
Rate	\$	1,584.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	Address 100 Serio Blvd, Ferriday, LA 713	
Billing Account Number	CHP.LA.0013	
Speed	N x T-1	
Rate	\$ 1,584.00	
nace	7 1,504.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	900 Foster Street, Jonesville, LA 71343	
Billing Account Number	CHP.LA.0014	
Speed	N x T-1	
Rate	\$ 1,584.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	126 Watson, Wisner, LA 71368		
Billing Account Number	CHP.LA.0015		
Speed	N x T-	1	
Rate	\$	2,376.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
ircuit Address 302A Bushley Street, Harrisonburg, LA 713		
Billing Account Number	CHP.LA.0016	
Speed	N x T-1	
Rate	\$ 1,590.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	307 Chisum Street, Sicily Island, LA 71368	
Billing Account Number	nt Number CHP.LA.0017	
Speed	100 mb Etherr	net
Rate	\$	2,200.00
Cost Itemization -		
Circuit Costs		
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	710 Chisum Street, Sicily Island, LA 71368	
Billing Account Number	CHP.LA.0018	
Speed	10 mb Ethernet	
Rate	\$	1,262.00
Cost Itemization -		
Circuit Costs		
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	100 Serio Blvd, Ferriday, LA 71334	
Billing Account Number	CHP.LA.0019	
Speed	10 mb Ethernet	
Rate	\$ 1,262.00	
Cost Itemization -		
Circuit Costs		
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	900 Foster Street, Jonesville, LA 71343	
Billing Account Number	CHP.LA.0020	
	10 1 51	
Speed	10 mb Ethernet	
Rate	\$ 1,262.00	
Cost Itemization -		
Circuit Costs		
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	126 Watson, Wisner, LA 71368		
Billing Account Number	CHP.LA.0021		
Speed	10 mb Ethernet		
Rate	\$ 2,652.	.00	
Cost Itemization -			
Circuit Costs			
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	Address 302A Bushley Street, Harrisonburg, LA 7134		
Billing Account Number	CHP.LA.0022		
Speed	10 mb Ethernet		
Rate	\$ 1,262.00		
Cost Itemization -			
Circuit Costs			
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address	307 Chisum Street, Sicily Island, LA 71368	
Billing Account Number	CHP.LA.0023	
Speed	100 mb Ethernet	
Rate	\$	1,900.00
Cost Itemization -		
Circuit Costs		
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	123 McComb Ave, Port Gibson, MS 31950		
Billing Account Number	CLA.MS.0003		
Speed	100 mb Ethernet		
Rate	_ \$	11,675.00	
Cost Itemization -	<u>-</u> -		
Circuit Costs	_ \$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	178 Highway 24, Centreville, MS 39631		
Billing Account Number	FMH.MS.0015		-
Speed		1 gb Ethernet	
Rate	_ _ \$	2,621.00	
Cost Itemization -	_		
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			_
			= -
			- -

Circuit Information			
Circuit Address 551 Eaker Street, Eden, TX 7			
Billing Account Number	FRO.TX.0001		
Speed	45 mb		
Rate	\$	9,446.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address 216 E College Ave, Mason, TX 768			
Billing Account Number	FRO.TX.0004		
C I	N 74		
Speed	N x T-1		
Rate	\$ 2,055.00		
nate	2,033.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Dougouto de Manain			
Percentage Margin			

Circuit Information			
Circuit Address 1211 S Bridge Street, Brady, TX			
Billing Account Number	FRO.TX.0014		
Speed	10 mb Ethernet		
Rate	\$ 2,738.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address 29632 Highway 299 East, Round Mountain, CA		
Billing Account Number	HCC.CA.0005	
Speed	100 mb Ethernet	
Rate	\$	3,995.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	629 Nuckolls Road, Bolivar, TN 380		
Billing Account Number	HCC.TN.0013		
Speed	45mb DS3		
Rate	\$	1,363.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	629 Nuckolls Road, Bolivar, TN 38008		
Billing Account Number	HCC.TN.0014		
Chood	45mb DS3		
Speed	45mb DS3		
Rate	\$ 2,355.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	17 First Street East, Staton, TN 3806		
Billing Account Number	HCC.TN.0016		
Spand	10 m	ıb Ethernet	
Speed	10 111	ib Ethernet	
Rate	\$	10,680.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address	330 North Main Street, Aberdeen, ID 83210	
Billing Account Number	HWI.ID.0016	
Speed	100 mb Ethernet	
- Specu	200 mb ztnemet	
Rate	\$ 1,650.00	
Cost Itemization -		
Cost itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
TTE-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	79 North Main Street, Downey, ID 83234	
Billing Account Number	HWI.ID.0017	
Speed	100 mb Ethernet	
Rate	\$ 7,600.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 85 South 5th Avenue West, Lava Hot Springs, ID 83246		
Billing Account Number	HWI.ID.0018	
Speed	100 mb E	thernet
Rate	\$	6,200.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address 880 W Quinn Rd, Chubbuck, ID 83202			
Billing Account Number	HWI.ID.0019		
Speed 100 mb E		thernet	
Rate	\$	3,500.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address	655 South 4th Street E, Preston, ID 83263	
Billing Account Number	HWI.ID.0020	
Speed	100 mb Ethernet	
Rate	\$ 7,000.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 465 Memorial Drive, Pocatello		ID 83204
Billing Account Number	HWI.ID.0021	
Speed	100 mb Ethernet	
ореси	100 ma Emermet	
Rate	\$	4,500.00
Cost Itemization -		
Cost iternization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
operating and control dentity control		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		
i ereentage wargin	1	

Circuit Information		
Circuit Address 1000 North 8th Avenue, Pocatello, ID		
Billing Account Number	HWI.ID.0022	
Speed	100 mb Ethernet	
Rate	\$ 3,600.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	832 Reed Street, American Falls, ID 83211	
Billing Account Number	HWI.ID.0024	
Speed	N x T-1	
Rate	\$	500.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	330 North Main Street, Aberdeen, ID 83210	
Billing Account Number	HWI.ID.0025	
Speed	N x T-1	
Specu	NAT 1	
Rate	\$ 1,200.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	465 Memorial Drive, Pocatello, ID 83204	
Billing Account Number	HWI.ID.0030	
Speed	N x T-1	
Rate	\$	500.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	823 Reed Street, American Falls, ID 83211	
Billing Account Number	HWI.ID.0033	
Canad	1 ab 54	th awa at
Speed	1 go Ei	thernet
Rate	\$	15,100.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	823 Reed Street, American Falls, ID 83211	
Billing Account Number	HWI.ID.0034	
Speed	1 gb Ethernet	
Rate	\$	12,508.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circui	t Information		
Circuit Address	500 S. 11th Avenue, I	Pocatello, ID 83201	
Billing Account Number	HWI.ID.0035		
Speed	1 gh l	Ethernet	
Speed	I go i	Luieniet	
Rate	\$	15,194.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address	149 Staunton Drive, Weston, WV 26452	
Billing Account Number	CWV.WV.0001	
Speed	1 gb Ethernet	
Rate	\$ 7,092.80	
Cost Itemization -	_	
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	266 Skidmore Lane, Sutton, WV 26601		
Billing Account Number	CWV.WV.0002		
Speed	1 gb Eth	ernet	
Rate	\$	6,448.00	
Cost Itemization -	_		
Circuit Costs	\$		
Transport and Interconnection costs		<u>-</u>	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address	37 West Main St, Buckhannon, WV 26201	
Billing Account Number	CWV.WV.0003	
Speed	100 mb Ethernet	
Rate	\$ 2,563.0	
Cost Itemization -		
cost itermedition	_	
Circuit Costs	\$	
	I	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
The tax cost remization		
Federal and State Income Tax		
Margin		
Percentage Margin		
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Circuit Information		
Circuit Address	797 Clinic Road, Ivydale, WV 25113	
Billing Account Number	CWV.WV.0004	
Speed	100 mb Ethernet	
Rate	\$ 3,257.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	122 Center St, Clay, WV 25043	
Billing Account Number	CWV.WV.	0009
Speed	10	0 mb Ethernet
Rate	\$	3,257.00
Cost Itemization -		
COST ITCHIIZATION	_	
Circuit Costs	\$	
	ı	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Due toy cost itomication		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		
rercentage Margin		

Circ	Circuit Information	
Circuit Address Billing Account Number	100 Garden Fresh Plz Dr, Buckhannon, WV 26201 CWV.WV.00010	
Speed	100 mb Ethernet	
Rate	\$ 2,477.00	
Cost Itemization -	<u> </u>	
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	821 3rd	Ave, Marlinton,	WV 24954
Billing Account Number	CWV.W	/V.0011	
Speed		100 mb Etherne	et
		100 1110 211101111	
Rate	\$		3,257.00
Cost Itemization -	-		
Circuit Costs	\$		
Circuit Costs	Ų		
Transport and Interconnection costs			-
Operating and service delivery costs			
NAME OF THE PARTY			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			
Tereentage Wargin			

Circ	Circuit Information	
Circuit Address	6404 Potomac Highland Tr, Green Bank, WV 24944	
Billing Account Number	CWV.WV.0012	
S I	400 mb 511 mm	
Speed	100 mb Ethernet	
Rate	\$ 3,257.00	
nate	5,237.00	
Cost Itemization -		
	-	
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Dorgantaga Margin		
Percentage Margin		

Circ	Circuit Information	
Circuit Address	5851 Mason Dixon Highway, Blacksville, WV 26521	
Billing Account Number	CWV.WV.0013	
Connel	100 ask 5th t	
Speed	100 mb Ethernet	
Rate	\$ 3,257.00	
	, s,_s,_s	
Cost Itemization -	_	
	<u> </u>	
Circuit Costs	\$	
Transport and Interconnection costs	I	
Transport and Interconnection costs	-	
Operating and service delivery costs		
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Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
reactar and state meome tax	-	
Margin		
Percentage Margin		

Circuit Information	
Circuit Address	4498 Potomac Highland Trail, Green Bank, WV 24944
Billing Account Number	CWV.WV.0014
Speed	100 mb Ethernet
Rate	\$ 3,257.00
Cost Itemization -	_
Circuit Costs	\$
Transport and Interconnection costs	<u>-</u>
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information		
Circuit Address	7576 Seneca Trail, Hillsboro, WV 24946	
Billing Account Number	CWV.WV.0016	
Speed	10	mb Ethernet
Rate	\$	3,257.00
Cost Itemization -		
	=	
Circuit Costs	\$	
	Ţ	
Transport and Interconnection costs		-
Operating and service delivery costs		
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Working capital		
Books and the set of the		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Doroontogo Morgin		
Percentage Margin		

Cir	cuit Information
Circuit Address Billing Account Number	4 Northridge Dr, Suite 118, Buckhannon, WV 26201 CWV.WV.0017
Speed	100 mb Ethernet
Rate	\$ 3,257.00
Cost Itemization -	_
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Cir	cuit Information
Circuit Address	5917 Potomac Highlands Tr., Green Bank, WV 24944
Billing Account Number	CWV.WV.0021
Speed	10 mb Ethernet
Data	¢ 2.772.70
Rate	\$ 2,772.70
Cost Itemization -	
eost recinization	-
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Fre-tax cost iternization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit	Information
Circuit Address	1 Copperhead Way, Buckeye, WV 24924
Billing Account Number	CWV.WV.0022
Speed	10 mb Ethernet
Rate	\$ 2,772.70
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit I	nformation
Circuit Address	271 Warrior Way, Dunmore, WV 24934
Billing Account Number	CWV.WV.0024
Speed	10 mb Ethernet
Rate	\$ 2,772.70
Cost Itemization -	_
Circuit Costs	\$
Circuit Costs	—
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Fre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit In	formation		_
Circuit Address		e, Marlinton, WV 24954	
Billing Account Number	CWV.WV.002	25	
Snood	1() mb Ethernet	
Speed	10	This Ethernet	
Rate	\$	2,772.70	
Cost Itemization -	_		
	- ,		
Circuit Costs	\$		
Transport and Interconnection costs		_	
Transport and interconnection costs		-	
Operating and service delivery costs			
		_	
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
rederar and state meome rax			
Margin			
Percentage Margin			

Circuit	Information	
Circuit Address	College Ave, Buckhannon, WV 26201 V.WV.0027	
Billing Account Number	CWV.WV.0027	
Speed	10 mb Ethernet	
Rate	\$ 2,772.70	
Cost Itemization -	_	
Circuit Costs	\$	
Transport and Interconnection costs	<u>-</u>	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	50 B U Drive, Buckhannon, V	VV 26201
Billing Account Number	CWV.WV.0028	
Speed	10 mb Ethernet	
Speed	10 mb Ethernet	
Rate	\$	2,772.70
Cost Itemization -	_	
Circuit Code	- ,	
Circuit Costs	\$	
Transport and Interconnection costs		_
Operating and service delivery costs		
Working capital		
Due tou cost it aminoticus		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit	Information
Circuit Address	1176 Oil Creek Road, Roanoke, WV 26385
Billing Account Number	CWV.WV.0030
Speed	10 mb Ethernet
Rate	\$ 1,667.57
Cost Itemization -	_
Circuit Costs	\$
Transport and Interconnection costs	<u>-</u>
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

	Information		_
Circuit Address		r, Frametown, WV 26623	_
Billing Account Number	CWV.WV.0034		
Speed	10	mb Ethernet	
Rate	\$	2,772.70	
Cost Itemization -	-		
Circuit Costs	\$		
Transport and Interconnection costs		-	-
Operating and service delivery costs			-
Working capital			-
Pre-tax cost itemization			-
Federal and State Income Tax			-
Margin			-
Percentage Margin			

Circuit I	Information		
Circuit Address	78 Jerry Toth Dr, Shinns	ton, WV 26431	
Billing Account Number	CWV.WV.0035		
Speed	10 mb Ethe	ernet	
Rate	\$	2,772.70	
Cost Itemization -	_		
Circuit Costs	_ \$		
Transport and Interconnection costs		<u> </u>	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			
			

Circuit Information		
Circuit Address	200 Tetrick Rd, Shinnston, WV 26431	
Billing Account Number	CWV.WV.003	36
Speed	1	0 mb Ethernet
Rate	\$	2,772.70
Cook the mainstain		
Cost Itemization -	_	
Circuit Costs	_ \$	
Transport and Interconnection costs		-
Operating and service delivery costs		
operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
D		
Percentage Margin		

Circuit Information			
Circuit Address	219 Church Street, Clay, WV, 25043		V, 25043
Billing Account Number	CWV.WV	.0037	
Speed		10 mb Ethernet	
Rate	\$		2,772.70
Cost Itemization -	_		
Circuit Costs	_ \$	1	
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Transport and Interconnection costs			-
Operating and service delivery costs			
Working capital			
Tronking capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
ividi Siii			
Percentage Margin			

Circuit Info	rmation	
Circuit Address		oad, Duck, WV 25063
Billing Account Number	CWV.WV.	0038
Speed	1	0 mb Ethernet
Speca	-	o mo ememer
Rate	\$	2,772.70
Cost Itemization -	_	
C' '' C '-		
Circuit Costs	\$	
Transport and Interconnection costs		_
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
reactar and state meanie tax		
Margin		
Percentage Margin		

Circuit In	formatio	1	
Circuit Address	419 Churc	h Street, Clay, W	V 25043
Billing Account Number	CWV.WV.	0039	
Speed		10 mb Ethernet	
Speeu		10 mb Ethernet	
Rate	\$		2,772.70
	,		,
Cost Itemization -			
	<u> </u>		
Circuit Costs	\$		
	1		
Transport and Interconnection costs			-
Operating and service delivery costs			
Working capital			
Working capital	-		
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information				
Circuit Address	1 Panthe	er Dr, Clay, '	WV 25043	
Billing Account Number	CWV.W\	/.0040		
Speed	1	10 mb Ether	rnet	
Rate	\$		2,772.70	
Cost Itemization -	_			
Circuit Costs	\$			
Transport and Interconnection costs			-	
Operating and service delivery costs				
Working capital				
Pre-tax cost itemization				
Federal and State Income Tax				
rederal and State income Tax				
Margin				
Percentage Margin				

Circuit I	Information		
Circuit Address		Bomont, WV 25030	
Billing Account Number	CWV.WV.0041		
Speed	10 mb	Ethernet	
Rate	_ \$	2,772.70	
Cost Itemization -	<u> </u>		
Circuit Costs	\$		
Transport and Interconnection costs			
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
iviai giii			
Percentage Margin			

Circuit Information			
Circuit Address	1 Lizemore Street, Lizemore, WV 25125		
Billing Account Number	CWV.WV.0042		
Speed	10 mb Ethernet		
Rate	\$ 2,772.70		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address	38 East Lyndon Street, Lumberport, WV 26386	
Billing Account Number	CWV.WV.0043	
Speed	10 mb Ethernet	
D. L.	<u> </u>	
Rate	_ \$ 2,772.70	
Cost Itemization -	_	
COSt Itemization -	_	
Circuit Costs	\$	
55	•	
Transport and Interconnection costs	-	
-		
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
rederal and State income Tax		
Margin		
Percentage Margin		

Circuit Ir	formation	
Circuit Address	273 Education Way, Salem,	WV 26426
Billing Account Number	CWV.WV.0058	
Crood	10 mah Ethamaat	
Speed	10 mb Ethernet	
Rate	\$	2,772.70
	- [*]	_,,,_,,
Cost Itemization -	=	
	<u>-</u>	
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
operating and service delivery costs		
Working capital		
<u> </u>		
Pre-tax cost itemization		
Federal and State Income Tax		_
Marain		
Margin		
Percentage Margin		
. ereemage margin		_

Circuit	Information		
Circuit Address	149 Staunton Drive, Weston, WV 26452		
Billing Account Number	CWV.WV.0062		
Speed	1 gb Ethernet		
Rate	\$ 7,047.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit I	nformation				
Circuit Address	266 Skidmore Lane, Sutton, WV 26601				
Billing Account Number	CWV.WV.006	53			
Speed		1 gb Ethernet			
Data	¢		7 047 00		
Rate	_ \$		7,047.00		
Cost Itemization -	_				
2031 11211112411011	_				
Circuit Costs	_ \$				
		•			
Transport and Interconnection costs			-		
Operating and service delivery costs					
Working capital			_		
Pre-tax cost itemization					
FTE-tax cost itellization			_		
Federal and State Income Tax					
Margin					
Percentage Margin					

Circuit Information		
Circuit Address Billing Account Number	553 Route 20 South Rd, Buckhannon, WV 26201 CWV.WV.0065	
Speed	10 mb Ethernet	
Rate	_ \$ 2,772.70	
Cost Itemization -	- -	
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit	Informa	tion	
Circuit Address		nton Drive, Weston, W	/V 26452
Billing Account Number	CWV.WV	7.0066	
Speed		1 gb Ethernet	
Rate	\$		2,921.00
Cost Itemization -			
Circuit Costs	_ \$		
Transport and Interconnection costs			-
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit	Information		
Circuit Address	266 Skidmore Lane, Sutton, WV 26601		
Billing Account Number	CWV.WV.0067		
Speed	1 gb Ethernet		
Rate	\$ 2,921.00		
Cost Itemization -			
	<u> </u>		
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax	_		
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	50 Branscomb Road, Laytonville, CA 95454		
Billing Account Number	LVH.CA.0004		
Speed	100 mb Ethernet		
Rate	\$ 7,060.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	1310 Washington St, Marion, AL 36756		
Billing Account Number	RHM.AL.0011		
Speed	100 mb Ethernet		
Rate	\$ 3,865.	00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	rcuit Address 330 Old Hamburg Road, Uniontown, AL 36786		
Billing Account Number	RHM.AL.0012		
Speed	100 mb Eth	ernet	
Rate	\$	3,865.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address 2210 Highway 221 N, Camden, AL 3672		
Billing Account Number	RHM.AL.0013	
Speed	100 mb Ethernet	
Rate	\$ 4,030.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 867 County Road 59, Pine Apple, AL 3676		
Billing Account Number	RHM.AL.0014	
Speed	N x T-1	
Rate	\$ 2,504.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	111 Main Street, Thomaston, AL 36783		
Billing Account Number	RHM.AL.0015		
Speed	100 mb Ethernet		
Rate	\$	3,865.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	228 Selma Avenue, Selma, AL 36701		
Billing Account Number	RHM.AL.0016		
Speed	100 mb Ethernet		
Rate	\$	3,865.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

TeleQuality Operating Cost Allocations			
		\$	% of Income
Total Income	\$		
Estimated Expenses:			
Personnel - payroll, benefits and payroll taxes			
Operating - facilities, customer support, software, equipment, travel and insurance			
Administrative			
Bad debt expense			
Marketing			
Taxes and fees (other than income taxes)			
Total Estimated Expense	\$		
Overhead Expense Factor			
Excludes costs for meals and entertainment, debt costs in	cluding originati	on and interes	t expense,
late fees and charitable contributions			
Estimated based on historical data			

CERTIFICATE OF SERVICE

I, Remington Pool, hereby certify that on this day, a true and correct copy of the foregoing letter was filed on ECFS and hand-delivered to, and filed with, the Office of the Secretary at the Federal Communications Commission.

/s/ Remington Pool
June 22, 2018